

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE (MEMPHIS)**

ANTOINETTA ALEXANDER,
Plaintiff,

CASE NO. 2:23-cv-02556-SHM-atc

vs.

Judge Samuel H. Mays, Jr.
Magistrate Judge Annie T. Christoff

EQUIFAX INFORMATION SERVICES
LLC, EXPERIAN INFORMATION
SOLUTIONS LLC, and TRANS UNION LLC,
Defendants.

JOINT PROPOSED SCHEDULING ORDER

Pursuant to written notice and Local Rule 16.2, a scheduling conference was held on July 3, 2024. Present were *pro se* Plaintiff Antoinetta Alexander, and Ian Fuqua, Counsel for Defendant Trans Union LLC (“Trans Union”).

INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P 26(a)(1): July 19, 2024.

MOTIONS TO JOIN PARTIES: August 9, 2024.

MOTIONS TO AMEND PLEADINGS: August 23, 2024.

MOTIONS TO DISMISS: October 11, 2024.

ALTERNATIVE DISPUTE RESOLUTION:

(a) ADR DEADLINE PURSUANT TO ADR PLAN RULE 4.3(a): October 2, 2024.

<https://www.tnwd.uscourts.gov/pdf/content/MediationCertificationForm.pdf>

(b) SELECTION OF MEDIATOR PURSUANT TO ADR PLAN RULE 5.4(c)

MEDIATOR'S NAME: The Parties have not yet agreed on a mediator.

STIPULATION FILING DATE: July 19, 2024

(if no mediator has been selected by the parties, within 1 week of scheduling conference)
(if the parties fail to agree on a Mediator by this deadline, the Court shall select a mediator for the case from the Court's Mediator list and shall issue an Order notifying the parties of the Mediator's identity)

COMPLETING ALL DISCOVERY: March 14, 2025.

(a) WRITTEN DISCOVERY AND DOCUMENT PRODUCTION: March 14, 2025.

(b) DEPOSITIONS: March 14, 2025.

EXPERT WITNESS DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(2):

(a) DISCLOSURE OF PLAINTIFF'S RULE 26(a)(2) EXPERT INFORMATION:

January 10, 2025.

(b) DISCLOSURE OF DEFENDANT'S RULE 26(a)(2) EXPERT INFORMATION:

February 11, 2025.

(c) EXPERT WITNESS DEPOSITIONS: March 14, 2025.

SUPPLEMENTATION UNDER RULE 26(e)(1): March 14, 2025.

MOTIONS TO EXCLUDE EXPERTS/DAUBERT MOTIONS: April 15, 2025.

FILING DISPOSITIVE MOTIONS: April 15, 2025.

The Parties do not consent to trial before the Magistrate Judge

OTHER RELEVANT MATTERS:

As required by Local Rule 26.1(e), the parties have conferred as to whether they will seek discovery of electronically stored information (“e-discovery”) and have not reached an agreement regarding e-discovery and will comply with the default standards described in Local Rule 26.1(e) until such time, if ever, the parties reach an agreement, and the Court approves the parties’ e-discovery plan.

Pursuant to Local Rule 7.2(a)(1)(B), the parties are required to consult prior to filing any motion (except motions filed pursuant to Federal Rules of Civil Procedure 12, 56, 59, and 60).

Pursuant to the agreement of the parties, if privileged or protected information is inadvertently produced, the producing party may, by timely notice, assert the privilege or protection and obtain the return of materials without waiver.

No depositions may be scheduled to occur after the discovery deadline. All discovery requests or other discovery related filings that require a response must be filed sufficiently in advance of the discovery deadline to enable the opposing party to respond by the time permitted by the Rules prior to that date.

Motions to compel discovery are to be filed and served within forty-five days of the default or service of the response, answer, or objection that is the subject of the motion. However, if such default of service occurs within thirty days before the discovery deadline, the motion to compel must be filed within thirty days after such default or service.

This case is set for a jury trial. The pretrial order deadline, pretrial conference date, and trial date will be set by separate Order. The parties anticipate that the trial will last approximately 2-3 days.

The parties are ordered to engage in ADR by the ADR deadline. Pursuant to Local Rule 16.3(d) and ADR Plan Rule 5.11(b), within seven days of the mediator's submission of "Mediation Certification" and within fourteen days of completion of ADR, the parties shall file a notice confirming that the ADR was conducted indicating whether it was successful or unsuccessful, without disclosing the parties' respective positions at the ADR.

Pursuant to Local Rule 7.2(a)(1)(A), all motions, except motions pursuant to Federal Rule of Civil Procedure 12, 56, 59, and 60 shall be accompanied by a proposed order in a word processing format sent to the ECF mailbox of the presiding judge.

The opposing party must file a response to any opposed motion. Pursuant to Local Rule 7.2(a)(2), a party's failure to respond timely to any motion, other than one requesting dismissal of a claim or action, may be deemed good grounds for granting the motion.

Neither party may file an additional reply to any motion, other than a motion filed pursuant to Federal Rule of Civil Procedure 12(b), or 56, without leave of the Court. Pursuant to Local Rule 7.2(c), if a party believes that a reply is necessary, it shall file a motion for leave to reply within seven days of service of the response, setting forth the reasons a reply is required.

This order has been entered after consultation with the parties. Absent good cause shown, the deadlines set by this order will not be modified or extended.

SO ORDERED this ____ day of _____, 2024.

ANNIE T. CHRISTOFF
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted,

/s/ Ian N. Fuqua

Ian N. Fuqua, Esq. (IN# 38195-49)

(admitted *Pro Hac Vice*)

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*Local Counsel for Defendant Trans Union,
LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **5th day of July, 2024**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

Erin P. Polly, Esq. Erin.polly@klgates.com	Adam Theodore Hill, Esq. ahill@seyfarth.com
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **5th day of July, 2024**, properly addressed as follows:

<u>Pro Se Plaintiff</u> Antoinetta Alexander 1410 Keating St. Memphis, TN 38114 Alexander52061@gmail.com	
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/s/ Ian N. Fuqua

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